

# **EXHIBIT A**

10 Monday, May 13, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

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1 complete that analysis. I don't have any  
2 independent intentions of doing that.

3 Q. Sitting here today, you have no  
4 opinions about the legitimacy of the flagged  
5 orders from Dr. McCann's analysis, correct?

6 MR. FULLER: That misstates his  
7 report.

8 A. It's -- Dr. McCann's report  
9 doesn't report orders, it just reports dosage  
10 units. It doesn't say how many orders. It  
11 doesn't say there was an analysis of each  
12 individual order.

13 It looked at them whether or  
14 not they violated the trigger that was  
15 provided for each one of them, and if it --  
16 and then it moved forward without the --  
17 because already knowing that there was  
18 insufficient due diligence.

19 BY MR. EPPICH:

20 Q. And you reviewed -- let me  
21 strike that.

22 Let's turn to page 74 of your  
23 report. On page 74, I'm looking at  
24 Section 6, the second paragraph in  
25 particular. The first sentence there says:

1       There is no more effective control to prevent  
2       diversion than blocking a suspicious order  
3       before it is shipped.

4                          Did I read that correctly?

5           A.            You did, sir.

6           Q.            And that's because a blocked  
7       order of opioids remains safely in the vault  
8       of the distributor's warehouse, correct?

9           A.            I guess you could make that  
10      assumption. It doesn't leave the control of  
11      the distributor and have the potential to be  
12      diverted, so I think that's probably the same  
13      statement, yes, sir.

14          Q.            You'd agree that reporting the  
15      blocked order to DEA in a suspicious order  
16      report does not prevent the blocked order  
17      from being diverted, correct?

18          A.            Well, that hypothetical  
19      wouldn't occur because if you block an order  
20      and report it, that doesn't -- unless you're  
21      saying that that causes a distribution, and  
22      if that causes the distribution without the  
23      effective due diligence, then no, that would  
24      not be true.

25                          I would say that it would